

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

**JOHN WILLIAMS
DEANNA WILLIAMS,**

DEBTORS.

**Case No.: BK-15-13717-JDL
Chapter 13**

OBJECTION TO CHAPTER 13 PLAN OF DEBTORS

Comes now the secured creditor, Nationstar Mortgage, LLC, by their attorney, Jim Timberlake, and hereby objects to the Chapter 13 Plan of Debtors. In support of this Objection, Nationstar Mortgage, LLC would show the Court as follows:

1. Nationstar Mortgage, LLC is the holder of a purchase money note and mortgage on the real property, ("mortgaged property") of Debtors located at 10018 Isaac Drive, Midwest City, OK 73110. Said note and mortgage has an outstanding balance of \$53,239.55 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The Debtor's plan proposes a cramdown on the debt owed to Nationstar. While Nationstar disputes the value of the property (and subject to separate motions), asserted by the Debtors, Nationstar objects to proposed treatment of its secured claim as the secured debt (in whatever value determined) will not be paid in full within the term of the proposed Chapter 13 Plan and as required by 11 U.S.C. § 1325(a)(5)(b)(ii).

3. It is the belief of Nationstar that the subject property is rental/investment property of the Debtors and the subject property is either unoccupied or generating income insufficient to support the secured debt of Nationstar. Accordingly, the subject property is a burden on the estate and unnecessary to an effective reorganization.

WHEREFORE, PREMISES CONSIDERED, secured creditor, Nationstar Mortgage, LLC, moves the Court to reject the proposed Chapter 13 Plan of Debtors and/or to grant adequate

protection or such other and further relief as may be entitled.

NATIONSTAR MORTGAGE, LLC,

By: s/ Jim Timberlake
JIM TIMBERLAKE - #14945
Baer Timberlake, P.C.
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Oklahoma City, OK 73102
Telephone: (405) 842-7722
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Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on November 10, 2015.

John Williams
DeAnna Williams
3320 Norcrest Drive
Oklahoma City, OK 73121

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

Gabriel Rivera
PO Box 7837
Moore, OK 73153-1837

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